

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

FRANCESCA GINO,

Plaintiff,

V.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE, SRIKANT  
DATAR, JOHN DOES 1-10, AND JANE  
DOES 1-10,

Defendants.

Case No. 1:23-cv-11775-MJJ

**JOINT MOTION TO ENTER AMENDED SCHEDULING ORDER**

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Local Rule 16.1(g), and the Court’s November 20, 2024 Scheduling Order (Doc. No. 88, as amended on July 22, 2025 (Doc. No. 123) and on October 14, 2025 (Doc. No. 151), the “Scheduling Order”), the Parties respectfully move the Court to enter an Amended Scheduling Order. On November 20, 2025, a status conference was held to discuss the status of discovery, at which time the Court ordered the parties to confer and file a new joint proposed schedule, including when the case will be ready for trial, by November 26, 2025. The parties have conferred and have agreed to the proposed amendment to the Scheduling Order set forth herein.

Accordingly, the Parties respectfully request that the Court enter an Amended Scheduling Order revising the following dates from the operative Scheduling Order:

<b>Event</b>	<b>Current Scheduling Order Deadline</b>	<b>Proposed Deadline</b>
<b>Fact Discovery</b>		
Plaintiff to produce all outstanding discovery except for forensic images	N/A	December 12, 2025
Deadline for parties to agree on forensic image protocol or to seek Court assistance on protocol	N/A	December 12, 2025
Deadline for producing all forensic images subject to protocol	N/A	January 9, 2025
Completion of fact discovery	December 20, 2025	February 26, 2026
<b>Expert Discovery</b>		
Designation of experts and information contemplated by Rule 26(a)(2) by party bearing burden	October 23, 2025	March 23, 2026
Designation of rebuttal experts and information contemplated by Rule 26(a)(2)	November 17, 2025	April 17, 2026
Completion of expert depositions and discovery	December 5, 2025	May 5, 2026
<b>Dispositive Motions</b>		
Motions for summary judgment	January 19, 2026	June 23, 2026
Oppositions to dispositive motions	February 16, 2026	July 28, 2026
Reply memoranda	March 9, 2026	August 11, 2026
<b>Trial</b>		
Trial	N/A	December 2, 2026

**SO STIPULATED:**

Dated: November 26, 2025

/s/ Patrick J. Hannon

Patrick J. Hannon

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Respectfully submitted,

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*Attorneys for Defendants President  
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Srikant Datar*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: November 26, 2025

/s/ Douglas E. Brayley

Douglas E. Brayley